

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN**

KELLY KASUL, individually and on behalf of all others similarly situated,

Plaintiff,

v.

MADAVOR MEDIA, LLC,

Defendant.

Case No. 22-cv-00914-HYJ-RK

Honorable Hala Y. Jarbou

Magistrate Judge Ray Kent

**STIPULATION WITHDRAWING MOTION TO COMPEL WITHOUT PREJUDICE**

Plaintiff Kelly Kasul (“Plaintiff”) and Defendant Madavor Media, LLC (“Madavor,” together with Plaintiff, the “Parties”), by and through their respective counsel of record hereby stipulate as follows:

WHEREAS, on March 15, 2023, Plaintiff filed a Motion to Compel ([ECF No. 34](#)), which the Court is scheduled to hear on April 11, 2023 ([ECF No. 44](#));

WHEREAS, on March 28, 2023, undersigned counsel for Madavor appeared in this case in place of former defense counsel;

WHEREAS, since that time, the Parties have met and conferred in good faith regarding the issues in Plaintiff’s Motion to Compel and discovery in general and have narrowed many of their disputes;

NOW THEREFORE, the Parties stipulate as follows:

1. Madavor will provide Plaintiff with an estimate of the size of the putative class in advance of the April 17, 2023 settlement conference;
2. Madavor withdraws its objection that discovery is premature pending resolution of its motion to dismiss;

3. Madavor will serve amended responses and objections to Plaintiff's First Set of Requests for Production of Documents and First Set of Interrogatories on or before May 8, 2023;

4. Plaintiff's Motion to Compel is withdrawn without prejudice.

SO ORDERED.

Dated: April 10, 2023  
Grand Rapids, Michigan

/s/ Ray Kent

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RAY KENT  
United States Magistrate Judge

Dated: April 7, 2023

*/s/ E. Powell Miller*

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*/s/ David W. Centner*

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2023, I electronically filed the foregoing document(s) using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

*/s/ E. Powell Miller* \_\_\_\_\_  
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